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CLERK, U.S. DISTRICT COURT

12/05/2023

CENTRAL DISTRICT OF CALIFORNIA

BY: TV DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN JACOBS,

Defendant.

CR No. 2:23-cr-00589-ODW

[18 U.S.C. § 875(c): Threats by Interstate Communication]

The Grand Jury charges:

[18 U.S.C. § 875(c)]

On or about October 19, 2023, in Los Angeles County, within the Central District of California, and elsewhere, defendant RYAN JACOBS, with intent to issue a threat, and with knowledge that it would be viewed as a threat, knowingly transmitted in interstate commerce an electronic communication that contained a true threat to injure the person of another, namely, J.G., in that defendant JACOBS threatened: "I'm going to kill [J.G.] and every single person at the ADL. Will be

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the start of a real holohocaust ho ho ho not fake like the 6 million 1 2 (Red Cross estimators put the number at ~200k Ashkenazi Jews lost)." 3 4 A TRUE BILL 5 /s/ 6 Foreperson 7 E. MARTIN ESTRADA 8 United States Attorney 9 MACK E. JENKINS Assistant United States Attorney 10 Chief, Criminal Division 11 12 13 SCOTT M. GARRINGER Assistant United States Attorney 14 Deputy Chief, Criminal Division 15 IAN YANNIELLO Assistant United States Attorney 16 Deputy Chief, General Crimes Section 17 COLIN S. SCOTT 18 Assistant United States Attorney General Crimes Section 19 20 21 22 23 24 25 26 27 28